

**Office of the Attorney General**  
**Grants Internal Policy**  
**Re: Victims of Crime Act Subawards**  
**Payment of Executive Salaries and Expenses**

**CORE STANDARD**

The salaries and expenses of management - to include salaries, benefits, fees, furniture, equipment, and other expenses of executive directors, board members, and other administrators are expressly unallowable sub-recipient costs (28 CFR 94.122). The purpose of this internal policy is to ensure that executive salaries and expenses are NOT being charged to VOCA unless the applicant successfully establishes that an executive salary payment is warranted under 28 CFR subpart 94.120 *Allowable costs for activities supporting direct services* OR 28 CFR subpart 94.121 *Allowable sub-recipient administrative costs*. The Burden of Proof lies on the applicant to demonstrate, in writing to OAG, that a clear linkage exists between the executive's grant tasks and the agency's ability to carry out the direct victim services outlined in the grant project.

The Office of the Attorney General (OAG), as the federal grantee, is responsible for reviewing and approving, all sub-recipient budget items. All grant expenses must be allowable, reasonable, and necessary to effectively facilitate the provision of direct victim services under the grant award.

**PROGRAM REQUIREMENTS**

Policies and Procedures -

**I. Criteria that must be established for Executive Salary in subaward Budget Narrative:**

*1. 28 CFR 94.120 Allowable costs for activities supporting direct services*

- a) *Coordination of activities*—Coordination activities that facilitate the provision of direct services, include, but are not limited to, State-wide coordination of victim notification systems, crisis response teams, multi-disciplinary teams, coalitions to support and assist victims, and other such programs, and salaries and expenses of such coordinators;
- b) *Supervision of direct service providers*—Payment of salaries and expenses of supervisory staff in a project, when the SAA determines that such staff are necessary and effectively facilitate the provision of direct services;

AND/OR;

*2. 28 CFR 94.121 Allowable sub-recipient administrative costs*

- a) *Personnel costs*—Personnel costs that are directly related to providing direct services and supporting activities, such as staff and coordinator salaries expenses (including fringe benefits), and a prorated share of liability insurance;

## **I. OAG Review and Approval of Executive Salary**

Reviewer Must Answer YES to Both Questions Below For Executive Salary Budget Approval:

1. As written, are the executive/manager/director's grant tasks necessary to effectively facilitate the provision of direct victim services under the grant project? (Yes or No).
2. As written, is the executive/manager/director the only agency staff member qualified or available to complete said grant tasks to effectively facilitate the provision of direct victim services under the grant project? (Yes or No).